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Counsel for Defendant, Kraft Foods Group, Inc.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

YURI OSBORNE, on behalf of himself and all
others similarly situated,

Plaintiff,

v.

KRAFT FOODS GROUP, INC., a Virginia
corporation,

Defendant.

Case No.: 3:15-cv-2653-VC

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND BRIEFING
DEADLINES AND HEARING DATE FOR
DEFENDANT'S MOTION TO DISMISS**

CLASS ACTION

Hearing Date: September 24, 2015
Hearing Time: 10:00 am
Courtroom: 4
Judge: Hon. Judge Vincent Chhabria

1 WHEREAS, pursuant to Civil L.R. 6-2, Plaintiff, Yuri Osborne (“Plaintiff”), individually
2 and on behalf of all others similarly situated, with Defendant, Kraft Foods Group, Inc.
3 (“Defendant”) (together, the “Parties”), by and through their undersigned counsel, hereby stipulate
4 as follows, subject to a Court Order approving the Stipulation;

5 WHEREAS, on August 12, 2015 Defendant filed a Motion to Dismiss Plaintiff’s Complaint
6 (Doc. No. 15) (“Motion”), which is currently pending and set for hearing on September 24, 2015,
7 before this Honorable Court;

8 WHEREAS, Plaintiff’s deadline to file its Response to Defendant’s Motion (“Response”) is
9 currently set for August 26, 2015;

10 WHEREAS, Defendant’s deadline to file its Reply in support of its Motion (“Reply”) is
11 currently set for September 2, 2015;

12 WHEREAS, the Parties have agreed to a 3-week extension for Plaintiff to file its Response
13 and for Defendant to file its Reply, and further agree to a 3-week continuance of the hearing
14 currently set for Defendant’s Motion;

15 WHEREAS, the Parties have agreed to extend Plaintiff’s deadline to file its Response to
16 September 16, 2015;

17 WHEREAS, the Parties have agreed to extend Defendant’s deadline to file its Reply to
18 September 23, 2015;

19 WHEREAS, the Parties have agreed to continue the hearing on Defendant’s Motion to
20 October 15, 2015;

21 WHEREAS, good cause exists for the extensions because Plaintiff and Defendant require
22 additional time to properly respond and reply, respectively, regarding Defendant’s Motion, and the
23 Plaintiff and Defendant have agreed to the stipulated extensions;

24 THEREFORE, IT IS HEREBY STIPULATED, pursuant to Civil L.R. 6-2, that:

- 25 (1) Plaintiff has until September 16, 2015, to file a Response to Defendant’s Motion;
26 (2) Defendant has until September 23, 2015, to file its Reply to Defendant’s Motion;
27 (3) The hearing on Defendant’s Motion should be continued to October 15, 2015;

1 **IT IS SO STIPULATED AND AGREED.**

2 **Respectfully submitted,**

3 Dated: August 20, 2015

By: /s/ Benjamin M. Lopatin

Benjamin M. Lopatin, Esq.

Cal. Bar No.: 281730

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*Counsel for Plaintiff Yuri Osborne
and the Proposed Class*

-and-

12 Dated: August 20, 2015

By: /s/ Kenneth K. Lee

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Counsel for Defendant, Kraft Foods Group, Inc.

ATTESTATION

I hereby attest that I have on file written authorization for any signatures indicated by a
“conformed” signature (/s/) in this e-filed document.

/s/ Benjamin M. Lopatin

Benjamin M. Lopatin

CERTIFICATE OF SERVICE

The undersigned certifies that on August 20, 2015, the foregoing was electronically filed
with the Clerk of the Court using the CM/ECF system, which will send copies to all counsel of
record.

/s/ Benjamin M. Lopatin

Benjamin M. Lopatin

~~PROPOSED~~ ORDER

Pursuant to the foregoing stipulation, it is so ordered.

Dated: August 21, 2015



The Honorable Vincent Chhabria
United States District Court Judge